## UNITED STATES DISTRICT COURT DISTRICT OF MASSACHUSETTS

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v.

CROWN CLOTHING CORPORATION, Civil Action No. 05-10049 (NG)

Plaintiff

RANDCORE, INC.,

RAND INTERNATIONAL TRADING, INC., ANDRE BERNARD, AND RONALD BERNARD,

Defendants

## MOTION OF DEFENDANTS' COUNSEL TO CONTINUE HEARING ON MOTION TO WITHDRAW

Now comes the undersigned, counsel for the defendants Andre Bernard, Rand International Trading, Inc. and Randcore, Inc., and moves for a continuance in the hearing on his motion to withdraw. In support of this motion, the undersigned states:

- The motion to withdraw has been scheduled for hearing on December 21 1. before Magistrate Judge Bowler.
- December 21<sup>st</sup> is the last day of a brief scheduled vacation out of the 2. country for which non-refundable airline tickets have been purchased.
- 3. Undersigned counsel, as well as counsel for the plaintiff, are available for hearing on this matter on January 3, 6, 9 or 11.
- 4. Counsel for the plaintiff has indicated he does not oppose this motion, and counsel for the co-defendant has not opposed the motion to withdraw.

WHEREFORE, undersigned counsel moves to reschedule the hearing on the motion to withdraw to one of the four indicated dates in January.

Respectfully submitted,

/s/ Jeffrey S. Stern\_\_\_

Jeffrey S. Stern, (BBO No. 479460) Sugarman, Rogers, Barshak & Cohen, P.C. 101 Merrimac Street, 9<sup>th</sup> Floor Boston, MA 02114 (617) 227-3030

DATED: December 9, 2005

## CERTIFICATE OF SERVICE

I, Jeffrey S. Stern, hereby certify that on the above date I served the within document by mailing a copy of same, postage prepaid, to the following counsel of record:

John C. Wyman, Esquire Ryan MacDonald, Esquire Murtha Cullina LLP 99 High Street Boston, MA 02110

Gary R. Greenberg, Esquire Greenberg Traurig One International Place Boston, MA 02110

/s/ Jeffrey S. Stern

Jeffrey S. Stern

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